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# BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, DC 20268-0001

First-Class Mail and Periodicals Service	
Standard Changes	) Docket No. N2021-1

# FIRST SET OF INTERROGATORIES TO USPS WITNESS MONTEITH (USPS-T4)

**Pursuant to** 39 C.F.R. § 3020.117, National Newspaper Association submits the following interrogatories and requests for documents and responses to USPS Witness Monteith.

Respectfully submitted,

Tonda F. Rush Counsel to National Newspaper Association CNLC LLC

3898 30<sup>th</sup> St North Arlington, VA 22207 (703) 798-3159 May 19, 2021

Please refer to your testimony on p. 19 where you state:

"As previously noted, we will set our service performance targets to 95 percent once the new service standards are established, and we expect to meet or exceed those standards on a consistent basis. Consistent service performance will likely better align customers' expectations with actual delivery performance. As a result, these proposed changes may improve customer satisfaction and minimize any financial impact resulting from the changes by increasing the Postal Service's ability to consistently deliver mail within the customers' expectations."

- a. Please explain why USPS sets service performance targets.
- b. Why does USPS set its targets at 95 percent as opposed to any other number?
- c. Does the Postal Service believe the service targets are the functional equivalent of lowering the service standards and if not, why not?
- d. If the Postal Service believes current standards are unachievable, why does it not simply lower the targets rather than changing the standards?
- e. Does the Postal Service have any studies or surveys that indicate a public understanding that service performance targets are not 100% of the standards?

a. Please confirm that the linked page on the USPS website is available for the general public to use to look up service standards and/or seek information on what to do about late-delivered mail. If you do not confirm, explain why not.

https://faq.usps.com/s/article/Delayed-Mail-and-Packages#check mail delivery standards

- b. Please confirm that the service standards listed on this page do not incorporate any reference to service performance targets.
- c. Please confirm that the list of service standards listed on this webpage does not provide an expected service standard for newspapers or magazines. If you confirm, please explain why other mail products are listed but not Periodicals.
- d. Please confirm that the only reference on this page to newspapers or magazines directs the viewer to contact the publisher in the event of service delays, but provides no way to contact the Postal Service about these specific products.
- e. Please confirm that the directory linked to the question "Who do I notify if my mail is late?" provides only physical locations to local post offices and neither telephone numbers nor email addresses for mail recipients to use.
- f. In your view, do mail recipients have easy access to local postmasters, customer service representatives or any other representative to USPS if they wish to file a complaint or express concern about late delivery of any mailpiece other than packages? Please explain your response?
- g. If the proposed service standards are put into effect, does the Postal Service expect to provide an alert on this page to the general public that the service standards have been lowered?

With respect to late delivery of newspapers,

- a. Do you believe the Postal Service has received an increased volume of complaints about late-delivered newspapers in FY 2020 and FY 2021? Please explain the basis of your response.
- b. Does the Postal Service receive reports from postmasters or letter carriers about late-delivered newspapers? If so, please describe the information that would appear in these reports.
- c. Does the Postal Service compile reports or any other data from consumer complaints on late delivery of newspapers under existing Service Standards filed or expressed to any other source within the postal system other than postmasters or letter carriers?
- d. Does the Postal Service expect to compile reports or any other data from consumer complaints on late delivery of newspapers under the new service standards?

Does the Postal Service intend to deliver end-to-end newspapers with 5-7 days 95% of the time if the new standards are adopted? Please explain your response.